

**CUSTOMER  
NAME  
STREET No.  
ZIP-CODE, PLACE**

**Urgent Safety Notice**  
**Recall**  
**concerning the**  
**sterile Trauma Plate Systems**

Berlin, May 5<sup>th</sup>, 2017

**Reference-No.:** CAPA 2017 - 006  
**Sender:** aap Implantate AG, Lorenzweg 5, 12099 Berlin, Germany  
**Recipient:** User, Head of Orthopedic Surgery, Head of Orthopedics; Clinical  
Director, CEO, Sales Partner

**Identification of medical devices affected:**

**Medical device:** Osteosynthesis, trauma implant  
**Product description:** Find annex A  
**Product number:** Find annex A  
**Lot code:** all lots

Dear customer,

we would like to inform you about particular circumstances relating to sterile trauma plates.

**Description of the problem including the identified cause:**

Background for the corrective action including the description of the product problem

aap Implantate AG induces a recall of unused sterile packed trauma plate systems with product numbers as mentioned in annex A. All batches are involved.

The concerned sterile trauma plates and hinges have been marketed with a sterile barrier system and an outer packaging. The sterile barrier system is realized by a combination of an inner and outer sealed peel pouch. Within the framework of the revalidation of transport and single device packaging aap Implantate AG has discovered that with regard to the sterile barrier system of the concerning products a damage or deterioration of the sterile packaging in unfavorable cases cannot be excluded. Consequently, the sterility of product can not longer be guaranteed. Implantation of unsterile products can lead to infection. Infections could unwantedly impair the healing progress and patient well-being, which is why the aap Implantate AG has decided to recall all sterile trauma plate systems.

Risk for patients, users and third parties in case of further usage of the product, including evaluation of risks

high probability	Sterility of outer and inner peel pouch is not impaired, because the marketed product is not exposed to the extreme constellation of the transport and packaging validation.
Risk	<b>No short-term</b> health consequences (injury or illness), that result form the application of the concerning products or rather by their exposure.
	<b>No long-term</b> health consequences (injury or illness), that result form the application of the concerning products or rather by their exposure.
Evaluation	The manufacture has received no complaints or objections of the market, that indicate a link to the described problem. Therefore the probability of occurrence of sterile barrier system damage is classified as low.

<b>Low probability</b>	<p>Sterility of the outer peel pouch is impaired, but sterility within the inner peel pouch is still intact. Sterility of the product persists while the product is handled and introduced into the sterile area.</p>
<b>Risk</b>	<p><b>No short-term</b> health consequences (injury or illness), that result from the application of the concerning products or rather by their exposure.</p>
	<p><b>No long-term</b> health consequences (injury or illness), that result from the application of the concerning products or rather by their exposure.</p>
	<p>The damaged outer peel pouch can lead to unsterility of the inner peel pouch. A contamination of the sterile area can occur during transfer from unsterile area into the operating area.</p>
<b>Evaluation</b>	<p>On basis of an intact inner sterile barrier the implant remains sterile. Thus, the risk of a patient's infection is assessed as low.</p> <p>A damaged outer sterile barrier can cause an impairment of the sterile area though, which in turn increases the infection risk of the patient.</p>

<b>Very low probability</b>	<p>Sterility of the outer and inner peel pouch is impaired. The sterility of the product can be compromised by the defective packaging.</p> <p>Due to impairment of the sterile barriers and the handling of the product during introduction into the sterile area the sterility of the product is impaired.</p>
<b>Risk</b>	<p><b>Short-term</b> health consequences can be wound infection, that require a treatment beyond the standards of care.</p>
	<p><b>Long-term</b> health consequences can be infections, that lead to a revision surgery, unless the infection can be fought alternatively.</p>
<b>Evaluation</b>	<p>The probability of unsterility is classified as very low, because this kind of packaging has been used on the market for many years and as yet no relating incidents have occurred. Furthermore, it should be noted that surgeons administer antibiotics intra operative as well as post operative in order to reduce the risk of infection.</p>

Risk for patients, that were treated with concerning products, including evaluation of risks

<b>high probability</b>	Sterility of outer and inner peel pouch is not impaired, because the marketed product is not exposed to the extreme constellation of the transport and packaging validation.
Risk	<b>No short-term</b> health consequences (injury or illness), that result form the application of the concerning products or rather by their exposure.
	<b>No long-term</b> health consequences (injury or illness), that result form the application of the concerning products or rather by their exposure.
Evaluation	The manufacture has received no complaints or objections of the market, that indicate a link to the described problem. Therefore the probability of occurrence of sterile barrier system damage is classified as low.

<b>Low probability</b>	Sterility of the outer peel pouch is impaired, but sterility within the inner peel pouch is still intact. Sterility of the product persists while the product is handled and introduced into the sterile area.
Risk	<b>No short-term</b> health consequences (injury or illness), that result form the application of the concerning products or rather by their exposure.
	<b>No long-term</b> health consequences (injury or illness), that result form the application of the concerning products or rather by their exposure.
	The damaged outer peel pouch can lead to unsterility of the inner peel pouch. A contamination of the sterile area can occur during transfer from unsterile area into the operating area.
Evaluation	On basis of a sterile product provided by an intact inner sterile barrier, a low risk remains that the patient will be infected, nevertheless, by the contaminated sterile area.  Infections due to product or operation area emerge with high possibility within 3 month after implantation of the product.

<b>Very low probability</b>	Sterility of the outer and inner peel pouch is impaired. The sterility of the product can be compromised by the defective packaging. Due to impairment of the sterile barriers and the handling of the product during introduction into the sterile area the sterility of the product is impaired.
Risk	<b>Short-term</b> health consequences can be wound infection, that require a treatment beyond the standards of care.
	<b>Long-term</b> health consequences can be infections, that lead to a revision surgery, unless the infection can be fought alternatively.
Evaluation	The probability of unsterility is classified as very low, because this kind of packaging has been used on the market for many years and as yet no relating incidents have occurred.  Infections due to product or operation area emerge with high possibility within 3 month after implantation of the product.

### What actions does the recipient now need to implement?

Please take the following actions without delay:

1. Please immediately remove all products (see Annex A) from your stock to ensure that they can not be used.
2. With this letter you will receive a confirmation form, please complete it completely, sign it and send it back to us after receiving this information. If you do not have any affected products, please fill out the confirmation form and fax it to 0049 (0) 30 750 19 111 or mail it to [incident@aap.de](mailto:incident@aap.de).
3. Please return all affected products immediately to us.

### Recommendation for patients or treatment/aftercare of patients, which were treated with potentially concerned products

The general risk of non-sterility of the concerned products is considered as very low. Reasons for this are given on the one hand by using a double sterile packaging, by which sterility is still ensured even at damage of one foil, on the other hand based on the fact that no client complaint has ever occurred despite years of usage of this packaging. In the extremely unlikely event of unsterile implant application this might lead to an infection of patient which, consequently, makes an appropriate treatment necessary. Patients that were treated with the concerning products of the recall should therefore be checked in close-knit interval including the monitoring of relevant inflammation parameters, such as erythrocyte sedimentation rate (ESR), C-reactive protein (CRP) or leucocytes. Infection that could be caused by unsterile implants would be at short-term visible in shape of an inflammation that ought to be immediately responded to. However, if no correlating sign emerges after 8-10 weeks clinic, the risk to patient with regards to an implant issue can be classified as very low.

### Forwarding the safety notice:

1. Please ensure that all users of the specified products in your organization and all other applicable persons receive notification of this **"Urgent Safety Notice"**. If the products have been transferred to third parties, please forward a copy of this safety notice or inform the contact person specified below.
2. Please retain this information at least until all affected products have been returned to us.

The national regulators have been informed of this action.

The Federal Institute for Drugs and Medical Devices has received a copy of this "Urgent Safety Notice".

**Contact:** Should you have any queries, please do not hesitate to contact:

aap Implantate AG  
Lorenzweg 5  
12099 Berlin, Germany

Denis Kühn  
Medical Device Safety Officer  
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Tel. +49 (0)30 750 19 197  
Fax +49 (0)30 750 19 175

Yours truly,  
aap Implantate AG



Denis Kühn  
Director Quality Assurance & Regulatory Affairs

## Confirmation of recall of Sterile Trauma Plate Systems

Please return this form by fax or mail to us immediately, even if you no longer have any stock of the listed product.

- We confirm the receipt of this information. There is no stock of the product concerned. In the column "Return quantity in pieces" this was noted with the **quantity 0**.
- We confirm the receipt of this information. There is still stock of the product concerned, which will be collected from us.

**Please enclose this form of confirmation of recall of the return.**

Product description	Lot-number	Quantity of <i>aap</i> supplied	Return quantity in pieces
	all		

I confirm the complete examination of our stocks

Clinic: \_\_\_\_\_

Print Name: \_\_\_\_\_

Telephone number: \_\_\_\_\_

Signature/Date/Stamp \_\_\_\_\_

**Please return this form to one of the following addresses:**

Fax number: **030/750 19 111**

E-Mail: **incident@aap.de**

Postal address: **aap Implantate AG**  
**attn: Return Department**  
**Lorenzweg 5**  
**12099 Berlin**

**Annex A**  
**to FSN sterile trauma plate systems**

<b>Model Number</b>	<b>EN – Title</b>
PA 3521-14-2S	LOQTEQ® Dist. Anterolat. Tibia Plate 3.5, 14 holes, L 209, R Titanium, sterile
PA 3522-14-2S	LOQTEQ® Dist. Anterolat. Tibia Plate 3.5, 14 holes, L 209, L Titanium, sterile
PA 3580-00-2S	LOQTEQ® VA Hinge for periprosthetics 3.5, 2 pcs. Titanium, sterile
PF 4520-09-2S	LOQTEQ® Dist. Lateral Femur Plate PP, 9 holes, L 243, R Titanium, sterile
PF 4520-11-2S	LOQTEQ® Dist. Lateral Femur Plate PP, 11 holes, L 279, R Titanium, sterile
PF 4520-13-2S	LOQTEQ® Dist. Lateral Femur Plate PP, 13 holes, L 314, R Titanium, sterile
PF 4520-15-2S	LOQTEQ® Dist. Lateral Femur Plate PP, 15 holes, L 350, R Titanium, sterile
PF 4520-17-2S	LOQTEQ® Dist. Lateral Femur Plate PP, 17 holes, L 386, R Titanium, sterile
PF 4521-09-2S	LOQTEQ® Dist. Lateral Femur Plate PP, 9 holes, L 243, L Titanium, sterile
PF 4521-11-2S	LOQTEQ® Dist. Lateral Femur Plate PP, 11 holes, L 279, L Titanium, sterile
PF 4521-13-2S	LOQTEQ® Dist. Lateral Femur Plate PP, 13 holes, L 314, L Titanium, sterile
PF 4521-15-2S	LOQTEQ® Dist. Lateral Femur Plate PP, 15 holes, L 350, L Titanium, sterile
PF 4521-17-2S	LOQTEQ® Dist. Lateral Femur Plate PP, 17 holes, L 386, L Titanium, sterile
PH 3510-14-2S	LOQTEQ® Prox. Humerus Plate 3.5, 14 holes, L 221 Titanium, sterile
PH 3510-16-2S	LOQTEQ® Prox. Humerus Plate 3.5, 16 holes, L 247 Titanium, sterile
PH 3531-11-2S	LOQTEQ® Distal Dorsolat. Humerus Plate, 11 holes, L 206, R Titanium, sterile
PH 3532-11-2S	LOQTEQ® Distal Dorsolat. Humerus Plate, 11 holes, L 206, L Titanium, sterile
PK 3521-06-2S	LOQTEQ® Clavicle Shaft Plate 3.5, 6 holes, L 76, R Titanium, sterile
PK 3521-08-2S	LOQTEQ® Clavicle Shaft Plate 3.5, 8 holes, L 101, R Titanium, sterile
PK 3521-10-2S	LOQTEQ® Clavicle Shaft Plate 3.5, 10 holes, L 121, R Titanium, sterile
PK 3522-06-2S	LOQTEQ® Clavicle Shaft Plate 3.5, 6 holes, L 76, L Titanium, sterile
PK 3522-07-2S	LOQTEQ® Clavicle Shaft Plate 3.5, 7 holes, L 88, L Titanium, sterile
PK 3522-08-2S	LOQTEQ® Clavicle Shaft Plate 3.5, 8 holes, L 101, L Titanium, sterile
PK 3522-10-2S	LOQTEQ® Clavicle Shaft Plate 3.5, 10 holes, L 121, L Titanium, sterile
PO 4560-01-2S	LOQTEQ® High Tibia Osteotomy Plate 4.5 Titanium, sterile
PO 4561-01-2S	LOQTEQ® Distal Femur Osteotomy Plate 4.5, R Titanium, sterile
PO 4562-01-2S	LOQTEQ® Distal Femur Osteotomy Plate 4.5, L Titanium, sterile
SK 4580-00-2S	LOQTEQ® Cerclage button, large fragment, 2 pcs. Titanium, sterile